

No. CE/RE/MERC/FAC/2019/3662

Date: 04.02.2019

To
The Secretary,
Maharashtra Electricity Regulatory Commission,
13th Floor, Centre No.1, World Trade Centre,
Cuffe Parade, Mumbai – 400 005.

Sub: Petition for consideration of deemed generation on account of installation of off-grid solar pump under various solar AG pump scheme towards RPO fulfillment.

Respected Sir,

With reference to the above subject, please find enclosed herewith the Petition for consideration of deemed generation on account of installation of off-grid solar pump under various solar AG pump scheme towards RPO fulfillment.

MSEDCL has remitted the fees for the present Petition vide RTGS dated 30.01.2019 in favour of "Maharashtra Electricity Regulatory Commission Funds A/c". (NEFT OW:SBIN-MERC-P19013094813594 Rs. 10,000.00)

Submitted for the kind consideration of the Hon'ble Commission.

Thanking you,

Yours faithfully,



Chief Engineer (Renewable Energy)

Copy s. w. r. to:

1. The Director (Commercial), MSEDCL, Mumbai.
2. Executive Director (Infra), MSEDCL, Mumbai.



BEFORE THE MAHARASHTRA ELECTRICITY REGULATORY
COMMISSION

CASE NO. OF 2019

Filing No.: _____

IN THE MATTER OF

PETITION FOR CONSIDERATION OF DEEMED GENERATION ON
ACCOUNT OF INSTALLATION OF OFF-GRID SOLAR PUMP UNDER
VARIOUS SOLAR AG PUMP SCHEME TOWARDS RPO FULFILLMENT.

AND

IN THE MATTER OF AMENDMENT IN REGULATION 4.2 OF MERC
(RPO, ITS COMPLIANCE AND IMPLEMENTATION OF RENEWABLE
ENERGY CERTIFICATE FRAMEWORK) REGULATIONS, 2016;

AND

IN THE MATTER OF

REGULATION 18 and 19 OF MERC (RPO, ITS COMPLIANCE AND
IMPLEMENTATION OF REC FRAMEWORK) REGULATIONS, 2016.

AND

IN THE MATTER OF

SECTION 86 OF THE ELECTRICITY ACT 2003 DEALS WITH
FUNCTION OF STATE COMMISSION.

AND

IN THE MATTER OF

MAHARASHTRA STATE ELECTRICITY DISTRIBUTION COMPANY
LTD PETITIONER;

AFFIDAVIT ON BEHALF OF PETITIONER (MSEDCL) VERIFYING THE PETITION

I, Mrs. Kavita Gharat, aged 41 years, having my office at MSEDCL, Prakashgad, Bandra (E), Mumbai- 400 051, do hereby solemnly affirm and state as under;

1. I am Chief Engineer (Renewable Energy) of the Maharashtra State Electricity Distribution Co. Ltd, (herein after referred to as "MSEDCL" for the sake of brevity), in the above matter and am duly authorized to make this affidavit.
2. The statements made in paragraphs of the petition are true to my knowledge and belief and statements made in paragraphs one to five are based on information and I believe them to be true.
3. I say that there are no proceedings pending in any court of law/ tribunal or arbitrator or any other authority, wherein the Petitioner is a party and where issues arising and/or reliefs sought are identical or similar to the issues arising in the matter pending before the Commission.

Solemnly affirm at Mumbai on this 4 February, 2019 that the contents of the above affidavit are true to my knowledge, no part of it is false and nothing material has been concealed therefrom.

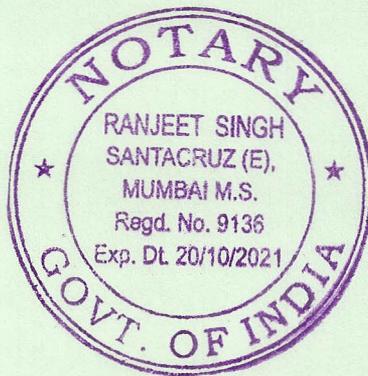
Deponent

K. Gharat

Identified before me

Place: Mumbai

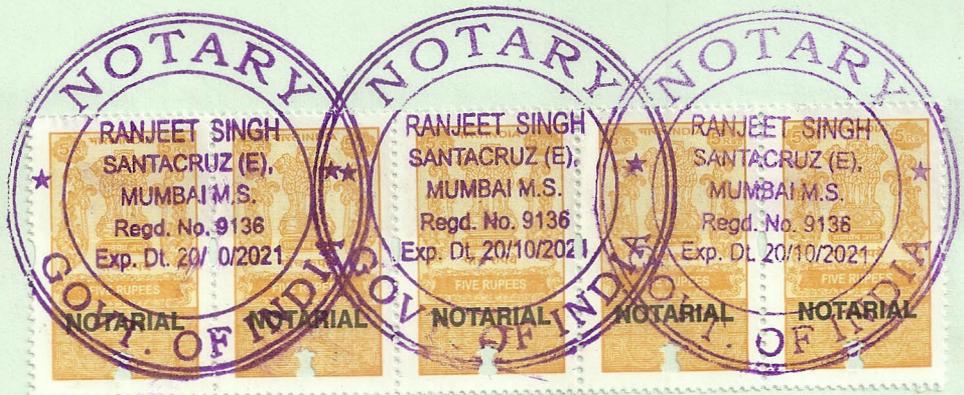
Date: 04.02.2019.



BEFORE ME

Rmb

RANJEET SINGH
M.Sc.LL.B
NOTARY
MAHARASHTRA
GOVT. OF INDIA
-4 JAN 2019



**MAHARASHTRA STATE ELECTRICITY DISTRIBUTION COMPANY
LTD. RESPECTFULLY SUBMITS:**

Background

Maharashtra State Electricity Distribution Co. Ltd. (*hereinafter to be referred to as "MSEDCL" or "the Petitioner"*) has been incorporated under Indian Companies Act, 1956 pursuant to decision of Government of Maharashtra to reorganize erstwhile Maharashtra State Electricity Board (*herein after referred to as "MSEB"*).

2. MSEDCL is a Company constituted under the provisions of Government of Maharashtra, General Resolution No. PLA-1003/C.R.8588/Energy-5 dated 25th January 2005 and is duly registered with the Registrar of Companies, Mumbai on 31st May 2005.
3. MSEDCL is functioning in accordance with the provisions envisaged in the Electricity Act, 2003 and is engaged, within the framework of the Electricity Act, 2003, in the business of Distribution of Electricity to its consumers situated over the entire State of Maharashtra, except some parts of city of Mumbai.
4. MSEDCL shall fulfil the targets set out by Hon'ble Commission under Regulation 7 of MERC (Renewable Purchase Obligations, Its Compliance and Implementation of REC Framework) Regulations, 2016.

MSEDCL's off-grid Solar pump schemes:

5. MSEDCL respectfully submits that MSEDCL has installed 5,700 nos. of Solar Ag Pumps under ATAL Solar Agriculture Pump Project. This scheme has a provision of web portal for reading and monitoring of the pump.
6. MSEDCL submits that the Government of Maharashtra has decided to energies 2,24,785 nos. of AG paid pending connections as on 31.03.2018 on High Voltage Distribution System (HVDS). As per HVDS Scheme, if the cost of AG Pump on HVDS exceeds Rs. 2.5 Lakhs, the connection of the pump will be either kept on hold till another connection comes nearby so that cost per pump is reduced or the connection will be released by installing off-grid Solar system.
7. The Government of Maharashtra declared the ambitious scheme called "Mukhyamantri Saur Krishi Pump Yojana" vide GR dated 15.11.2018 with the objective of day time irrigation facility to the farmers in the state of Maharashtra. In this scheme, 1 lakh off-grid solar pumps are to be installed in phased manner.



8. Under this scheme, MSEDCL will install 3HP/5HP DC submersible pumps. Further vide GR dated 01.01.2019, GoM has amended the above said GR and mentioned that the solar energy from these schemes shall be eligible for RPO fulfilment of MSEDCL.

9. The main features of the scheme are as below:

- a. Eligibility : Existing paid pending applicants (prior to March-2018), where cost of infrastructure by HVDS Scheme is more than 2.5 lac., All paid pending applications after 31.03.2018 and All new applications for Ag pump here afterwards.
- b. Application Procedure: Development of full-fledged web portal for the solar pump scheme for application purpose.
- c. Provision of Remote monitoring Arrangement with Water Discharge Reading & Recording Facility by providing SIM Card.
- d. The selected bidder shall establish minimum one call centre for providing timely services to the beneficiaries.
- e. Under this scheme it is decided to provide standalone lighting system comprising 2 LED bulbs, 1 USB port for mobile charging, one DC Fan and socket for battery charging.

10. Some of the benefits of off grid solar pumps are as below:

- a. Day time availability.
- b. To reduce distribution losses.
- c. To reduce electrical accidents.
- d. To improve the quality and the reliability of power supply to Ag consumers and ultimately increase in the revenue of the Company.
- e. Reduction in Distribution Transformer failure.
- f. Reduction of cross-subsidy burden of MSEDCL consumers.
- g. Promotes green energy and environmental benign.

11. For implementation of Atal Saur Krishi Pump Yojana in the state, the GoM has planned to provide 1,00,000 Solar agricultural pump to the Agricultural paid pending connections in the next 3 years in the phased manner, under Mukhyamantri Saur Krishi Pump Yojana. Accordingly, MSEDCL has floated two tenders for providing 50,000 and 25,000 solar pumps in first and second

phase. Both the tenders are under process.

Estimated Generation:

12. It is expected that annual generation from the off-grid pump considering 17.5 % CUF will be as below:

a. For a solar AG pump of capacity 3000Wp:

Estimated annual generation= 3000 Wp X 0.175(CUF) X 365 (days) X 24 (hrs) = 4599 units per annum.

b. For a solar AG pump of capacity 4800 Wp:

Estimated annual generation= 4800 Wp X 0.175(CUF) X 365 (days) X 24 (hrs) = 7358 units per annum.

Total estimated annual generation from these 75,000 solar Ag pumps after implementation of the scheme will be around 440 MUs.

Regulatory Provisions:

13. As per Regulation 4.2 of Maharashtra Electricity Regulatory Commission (Renewable Purchase Obligation, its Compliance and Implementation of Renewable Energy Certificate Framework) Regulations, 2016:

4.2 The eligible RE sources shall include **without limitation** the following :

.....

(f) Solar Power” (**emphasis added**)

14. As per Regulation 7.2 of Maharashtra Electricity Regulatory Commission (Renewable Purchase Obligation, its Compliance and Implementation of Renewable Energy Certificate Framework) Regulations, 2016:

“An Obligated Entity may meet its RPO target by way of its own generation or procurement of power from another RE Project or by purchase from a Licensee or by purchase of RECs or by a combination of these options: ...”

15. Haryana Electricity Regulatory Commission in its Order in the matter of Maruti Suzuki India Limited, New Delhi in Case No. HERC/PRO-19 of 2015 dated 14 December, 2016 ruled that the grid connectivity is not essential for adjustment

of RPO. Further, the Commission has ruled as under:

"...Thus, a self certification, based on generation data emanating from the meter installed at the solar power generator's end shall suffice for availing the benefit of adjustment of Solar RPO by way of self generation..."

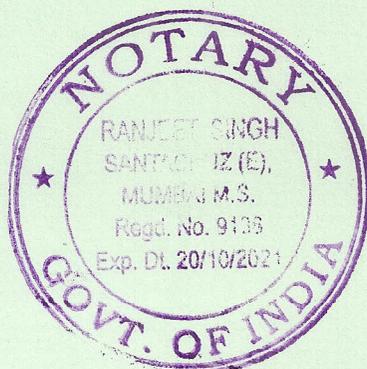
16. Estimated generation from these solar pumps is the own generation of MSEDCL and hence in line with above Regulations and in reference to the clause 8 of the GoM GR dated 01.01.2018, MSEDCL hereby requests the Hon'ble Commission to consider the power generated from these Off-Grid Solar Pumps for RPO fulfilment of MSEDCL.
17. MSEDCL also request to allow any solar generation from the Off-Grid Solar pumps in the similar schemes for RPO fulfilment of MSEDCL, in future.
18. Prayers: -

In view of the above the Petitioner respectfully prays to the Hon'ble Commission:

- a. To admit the Petition as per the provisions of the Regulation 18 and 19 of MERC (RPO, Its Compliance and Implementation of REC Framework) Regulations, 2016.
- b. To consider power generated from Off-Grid Solar Pumps as the deemed renewable generation and to consider it for the RPO fulfillment of MSEDCL.
- c. To consider the submission made by the Petitioner and consider the same positively while deciding the Petition as well as for further actions;
- d. To pass any other order/relief as the Hon'ble Commission may deem fit and appropriate under the circumstances of the case and in the interest of justice;
- e. Condone any error/omission and to give opportunity to rectify the same;
- f. To permit the Petitioner to make further submissions, addition and alteration to this Petition as may be necessary from time to time.

Place: Mumbai

Date: 04.02.2019



K. Khanat
Chief Engineer (Renewable Energy)